



U.S. Department of Justice

United States Attorney Eastern District of New York

TH/EEA F. #2014R01255

271 Cadman Plaza East Brooklyn, New York 11201

August 19, 2021

By ECF

The Honorable Allyne R. Ross United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Melendez-Rojas, et al.

Criminal Docket No. 17-434 (ARR)

Dear Judge Ross:

The government respectfully writes to request leave to file an omnibus sentencing memorandum for the defendants in the above-captioned case. The government makes this request because it anticipates that the defendants' sentencing memoranda may raise the same or similar issues, as well as similar objections to the Presentence Investigation Reports, which contain nearly-identical recitations of the relevant offense conduct. Consolidation of the government's responses will therefore avoid unnecessary duplication and inefficiency.

Counsel for defendants Jose Osvaldo Melendez-Rojas, Abel Romero-Melendez, and Francisco Melendez-Perez filed sentencing memoranda on August 6, 2021. (ECF Docket Entry Nos. 274-277.) Counsel for defendants Jose Miguel Melendez-Rojas, Rosalio Melendez-Rojas, and Fabian Reyes-Rojas have not yet submitted sentencing

memoranda. The government respectfully requests that it be permitted to file an omnibus sentencing memorandum for all defendants two weeks after any Court-ordered deadline for defendants' submissions.

Respectfully submitted,

JACQUELYN M. KASULIS Acting United States Attorney

By: /s

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